

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In Re: Oscar A Ochoa

Case No. 18-11925 - BFK  
Chapter 13

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JPMorgan Chase Bank, N.A., Movant

vs.

Oscar A Ochoa, Debtor  
aka Oscar Armando Ochoa  
Xenia Georgina Paz De Ochoa, Non-Filing  
Co-Debtor  
Thomas P. Gorman, Trustee

**AMENDED NOTICE OF MOTION FOR RELIEF FROM STAY  
AND CO-DEBTOR STAY  
AND HEARING THEREON  
2016 Jeep Cherokee Utility 4D Latitude 4WD 2.4L I4 VIN:1C4PJMCB3GW163295**

JPMorgan Chase Bank, N.A., Movant herein, has filed papers with the court seeking relief from the automatic stay of 11 U.S. C. Sec. 362 (a) to enable it to proceed with the sale of its Retail Installment Sale Contract. Your rights may be affected. You should read these papers carefully and discuss them with your lawyer, if you have one in this bankruptcy case. (If you do not have a lawyer, you may wish to consult one.)

The hearing is scheduled for **December 12, 2018 at 9:30 a.m.** in Courtroom I, United States Bankruptcy Court, 200 South Washington Street, Alexandria, VA 22314. If you do not want the court to grant the motion for relief from stay, or if you want the court to consider your views of the motion, then by **November 20, 2018** for the Debtor and **November 27, 2018** for the non-filing Co-Debtor, you or your lawyer must file a written response with the Clerk of the Bankruptcy Court explaining your position and mail a copy to:

Dinh Ngo, Esq.  
Attorney for Movant

McCabe, Weisberg & Conway, LLC  
312 Marshall Avenue, Suite 800  
Laurel, Maryland 20707

If you mail, rather than deliver, your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the court will receive it by the date stated above.

IF YOU OR YOUR LAWYER DO NOT TAKE THESE STEPS BY THE DEADLINE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT OR OTHERWISE DISPOSE OF THE MOTION BEFORE THE SCHEDULED HEARING DATE.

DATE: November 6, 2018

/s/ Dinh Ngo, Esq. [dn 11/6/18]

Attorney for Movant

Bar No. 85661

McCabe, Weisberg & Conway, LLC

312 Marshall Avenue, Suite 800

Laurel, MD 20707

301-490-1196

bankruptcyva@mwc-law.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of November, 2018 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing pleading will be served electronically by the Court's CM/ECF system on the following:

Thomas P. Gorman  
300 N. Washington St. Ste. 400  
Alexandria, VA 22314

Daniel M. Press  
Chung & Press, P.C.  
6718 Whittier Ave., Suite 200  
McLean, VA 22101

I hereby further certify that on the 6th day of November, 2018, a copy of the foregoing pleading was also mailed first class mail, postage prepaid to:

Oscar A Ochoa  
10244 Magnolia Grove Dr  
Manassas, VA 20110  
(Via U.S Mail)

Xenia Georgina Paz De Ochoa  
10244 Magnolia Grove Dr  
Manassas, VA 20110  
(Via U.S Mail)

/s/ Dinh Ngo, Esq.  
Dinh Ngo, Esq.